

EXHIBIT “C”

ALABAMA SJIS CASE DETAIL



County: **68** Case Number: **CV-2016-900836.00**
 Style: **KEIRSTON SIMPSON V. DENI KITEVSKI ET AL**

Court Action:

PREPARED FOR: PAUL MILLER

Real Time

Case

Case Information

County:	68-JEFFERSON -	Case Number:	CV-2016-900836.00	Judge:	AHV:ANNETTA H. VERIN
Style:	KEIRSTON SIMPSON V. DENI KITEVSKI ET AL				
Filed:	12/18/2016	Case Status:	ACTIVE	Case Type:	NEGLIGENCE MOTOR VEH
Trial Type:	JURY	Track:		Appellate Case:	0
No of Plaintiffs:	1	No of Defendants:	2		

Damages

Damage Amt:	0.00	Punitive Damages:	0.00	General Damages:	0.00
No Damages:		Compensatory Damages:	0.00		
Pay To:		Payment Frequency:		Cost Paid By:	

Court Action

Court Action Code:		Court Action Desc:		Court Action Date:	
Num of Trial days:	0	Num of Liens:	0	Judgment For:	
Disposition Date of Appeal:		Disposition Judge:	:	Disposition Type:	
Revised Judgement Date:		Minstral:		Appeal Date:	
Date Trial Began but No Verdict (TBNV1):					
Date Trial Began but No Verdict (TBNV2):					

Comments

Comment 1:
 Comment 2:

Appeal Information

Appeal Date:		Appeal Case Number:		Appeal Court:	
Appeal Status:		Orgin Of Appeal:			
Appeal To:		Appeal To Desc:		LowerCourt Appeal Date:	
Disposition Date Of Appeal:		Disposition Type Of Appeal:			

Administrative Information

Transfer to Admin Doc Date:		Transfer Reason:		Transfer Desc:	
Number of Subponeas:		Last Update:	12/18/2016	Updated By:	AJA

Parties

Party 1 - Plaintiff INDIVIDUAL - SIMPSON KEIRSTON

Party Information

Party:	C001-Plaintiff	Name:	SIMPSON KEIRSTON	Type:	I-INDIVIDUAL
Index:	D KITEVSKI DEN	Alt Name:		Hardship:	No
Address 1:	908 BERTRAM PLACE			JID:	AHV
				Phone:	(251) 282-6973

Address 2:
 City: HUEYTOWN State: AL Zip: 35023-0000 Country: US
 SSN: XXX-XX-X718 DOB: 01/01/1983 Sex: F Race:

Court Action

Court Action: Court Action Date:
 Amount of Judgement: \$0.00 Court Action For: Exemptions:
 Cost Against Party: \$0.00 Other Cost: \$0.00 Date Satisfied:
 Comment: Arrest Date:
 Warrant Action Date: Warrant Action Status: Status Description:

Service Information

Issued: Issued Type: Reissue: Reissue Type:
 Return: Return Type: Return: Return Type:
 Served: Service Type: Service On: Served By:
 Answer: Answer Type: Notice of No Service: Notice of No Answer:

Attorneys

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	SIM074		SIMPSON MARVIN EARL	MESIMPSON2917@ATT.NET	(205) 908-2385

Party 2 - Defendant INDIVIDUAL - KITEVSKI DENI**Party Information**

Party: D001-Defendant Name: KITEVSKI DENI Type: I-INDIVIDUAL
 Index: C SIMPSON KEIR Alt Name: Hardship: No JID: AHV
 Address 1: 8372 ASTER DRIVE, UNIT 3B Phone: (205) 000-0000
 Address 2:
 City: MERRILLVILLE State: IN Zip: 46410-0000 Country: US
 SSN: XXX-XX-X999 DOB: Sex: M Race:

Court Action

Court Action: Court Action Date:
 Amount of Judgement: \$0.00 Court Action For: Exemptions:
 Cost Against Party: \$0.00 Other Cost: \$0.00 Date Satisfied:
 Comment: Arrest Date:
 Warrant Action Date: Warrant Action Status: Status Description:

Service Information

Issued: 12/18/2016 Issued Type: C-CERTIFIED MAIL Reissue: 12/19/2016 Reissue Type: C-CERTIFIED MAIL
 Return: Return Type: Return: Return Type:
 Served: 01/25/2017 Service Type: C-CERTIFIED MAIL Service On: Served By:
 Answer: Answer Type: Notice of No Service: Notice of No Answer:

Attorneys

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	000000		PRO SE		

Party 3 - Defendant INDIVIDUAL - CLOBANU GHEORGHE**Party Information**

Party: D002-Defendant Name: CLOBANU GHEORGHE Type: I-INDIVIDUAL
 Index: C SIMPSON KEIR Alt Name: Hardship: No JID: AHV
 Address 1: 2460 RUSSEL ROAD Phone: (205) 000-0000
 Address 2:
 City: KENT State: WA Zip: 98832-0000 Country: US
 SSN: XXX-XX-X999 DOB: Sex: F Race:

Court Action

Court Action: Court Action Date:
 Amount of Judgement: \$0.00 Court Action For: Exemptions:
 Cost Against Party: \$0.00 Other Cost: \$0.00 Date Satisfied:
 Comment: Arrest Date:
 Warrant Action Date: Warrant Action Status: Status Description:

Service Information

Issued: 12/18/2016 Issued Type: C-CERTIFIED MAIL Reissue: 12/19/2016 Reissue Type: C-CERTIFIED MAIL
 Return: Return Type:
 Served: 01/25/2017 Service Type: C-CERTIFIED MAIL Service On:
 Answer: Answer Type: Notice of No Service: Notice of No Answer:

Attorneys

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	000000		PRO SE		

Financial**Fee Sheet**

Fee Status	Admin Fee	Fee Code	Payor	Payee	Amount Due	Amount Paid	Balance	Amount Hold	Garnish Party
ACTIVE	N	A0CC	C001	000	\$26.72	\$26.72	\$0.00	\$0.00	0
ACTIVE	N	CONV	C001	000	\$19.69	\$19.69	\$0.00	\$0.00	0
ACTIVE	N	CV05	C001	000	\$309.00	\$309.00	\$0.00	\$0.00	0
ACTIVE	N	JDMD	C001	000	\$100.00	\$100.00	\$0.00	\$0.00	0
ACTIVE	N	VADM	C001	000	\$45.00	\$45.00	\$0.00	\$0.00	0
Total:					\$500.41	\$500.41	\$0.00	\$0.00	

Financial History

Transaction Date	Description	Disbursement Account	Transaction Batch	Receipt Number	Amount	From Party	To Party	Money Type	Admin Fee	Reason	Attorney	Operator
12/19/2016	CREDIT	CONV	2017056	1996360	\$1.00	C001	000		N			ALH
12/19/2016	CREDIT	CONV	2017056	1996380	\$18.69	C001	000		N			ALH
12/19/2016	RECEIPT	AOCC	2017056	1996320	\$13.36	C001	000		N			ALH
12/19/2016	RECEIPT	AOCC	2017056	1996370	\$13.36	C001	000		N			ALH
12/19/2016	RECEIPT	CV05	2017056	1996390	\$309.00	C001	000		N			ALH
12/19/2016	RECEIPT	JDMD	2017056	1996400	\$100.00	C001	000		N			ALH
12/19/2016	RECEIPT	VADM	2017056	1996410	\$45.00	C001	000		N			ALH

Case Action Summary

Date:	Time	Code	Comments	Operator
12/18/2016	12:31 PM	ECOMP	COMPLAINT E-FILED.	SIM074
12/18/2016	12:31 PM	FILE	FILED THIS DATE: 12/18/2016 (AV01)	AJA
12/18/2016	12:31 PM	ORIG	ORIGIN: INITIAL FILING (AV01)	AJA
12/18/2016	12:31 PM	STAT	CASE ASSIGNED STATUS OF: ACTIVE (AV01)	AJA
12/18/2016	12:31 PM	EORD	E-ORDER FLAG SET TO "Y" (AV01)	AJA
12/18/2016	12:31 PM	ASSJ	ASSIGNED TO JUDGE: ANNETTA H. VERIN (AV01)	AJA
12/18/2016	12:31 PM	TDMJ	JURY TRIAL REQUESTED (AV01)	AJA
12/18/2016	12:31 PM	SCAN	CASE SCANNED STATUS SET TO: N (AV01)	AJA
12/18/2016	12:31 PM	C001	C001 PARTY ADDED: SIMPSON KEIRSTON (AV02)	AJA
12/18/2016	12:31 PM	C001	INDIGENT FLAG SET TO: N (AV02)	AJA
12/18/2016	12:31 PM	C001	C001 E-ORDER FLAG SET TO "N" (AV02)	AJA
12/18/2016	12:31 PM	C001	LISTED AS ATTORNEY FOR C001: SIMPSON MARVIN EARL	AJA
12/18/2016	12:31 PM	D001	INDIGENT FLAG SET TO: N (AV02)	AJA
12/18/2016	12:31 PM	D001	LISTED AS ATTORNEY FOR D001: PRO SE (AV02)	AJA
12/18/2016	12:31 PM	D001	CERTIFIED MAI ISSUED: 12/18/2016 TO D001 (AV02)	AJA
12/18/2016	12:31 PM	D001	D001 E-ORDER FLAG SET TO "N" (AV02)	AJA
12/18/2016	12:31 PM	D001	D001 PARTY ADDED: KITEVSKI DENI (AV02)	AJA
12/18/2016	12:31 PM	D002	D002 PARTY ADDED: CLOBANU GHEORGHE (AV02)	AJA
12/18/2016	12:31 PM	D002	INDIGENT FLAG SET TO: N (AV02)	AJA
12/18/2016	12:31 PM	D002	LISTED AS ATTORNEY FOR D002: PRO SE (AV02)	AJA
12/18/2016	12:31 PM	D002	CERTIFIED MAI ISSUED: 12/18/2016 TO D002 (AV02)	AJA
12/18/2016	12:31 PM	D002	D002 E-ORDER FLAG SET TO "N" (AV02)	AJA
12/18/2016	12:39 PM	EDISC	NOTICE OF DISCOVERY E-FILED.	SIM074
12/19/2016	11:44 AM	EAMEN	AMENDED COMPLAINT E-FILED.	SIM074
12/19/2016	11:45 AM	D002	D002 ADDR STATE CHANGED FROM: IN (AV02)	AJA
12/19/2016	11:45 AM	D002	REISSUE OF CERTIFIED MA ON 12/19/2016 FOR D002	AJA
12/19/2016	11:45 AM	D001	REISSUE OF CERTIFIED MA ON 12/19/2016 FOR D001	AJA
12/19/2016	12:59 PM	EAMEN	AMENDED COMPLAINT E-FILED.	SIM074
1/19/2017	2:47 PM	ESCAN	SCAN - FILED 1/5/2017 - RECEIPT	MOC
1/30/2017	1:26 PM	D002	SERVICE OF CERTIFIED MAI ON 01/25/2017 FOR D002	ALH
1/30/2017	1:26 PM	ESERC	SERVICE RETURN	ALH
2/1/2017	12:04 PM	D001	SERVICE OF CERTIFIED MAI ON 01/25/2017 FOR D001	ALH
2/1/2017	12:04 PM	ESERC	SERVICE RETURN	ALH



END OF THE REPORT



ELECTRONICALLY FILED
12/18/2016 12:31 PM
68-CV-2016-900836.00
CIRCUIT COURT OF
JEFFERSON COUNTY, ALABAMA
KAREN DUNN BURKS, CLERK

State of Alabama Unified Judicial System Form ARCiv-93 Rev.5/99	COVER SHEET CIRCUIT COURT - CIVIL CASE (Not For Domestic Relations Cases)	Ca: 68 Date of Filing: 12/18/2016 Judge Code:
GENERAL INFORMATION		
IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA KEIRSTON SIMPSON v. DENI KITEVSKI ET AL		
First Plaintiff: <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other		
First Defendant: <input type="checkbox"/> Business <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Government <input type="checkbox"/> Other		
NATURE OF SUIT: Select primary cause of action, by checking box (check only one) that best characterizes your action:		
TORTS: PERSONAL INJURY <input type="checkbox"/> WDEA - Wrongful Death <input type="checkbox"/> TONG - Negligence: General <input checked="" type="checkbox"/> TOMV - Negligence: Motor Vehicle <input type="checkbox"/> TOWA - Wantonness <input type="checkbox"/> TOPL - Product Liability/AEMLD <input type="checkbox"/> TOMM - Malpractice-Medical <input type="checkbox"/> TOLM - Malpractice-Legal <input type="checkbox"/> TOOM - Malpractice-Other <input type="checkbox"/> TBFM - Fraud/Bad Faith/Misrepresentation <input type="checkbox"/> TOXX - Other: _____	OTHER CIVIL FILINGS (cont'd) <input type="checkbox"/> MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/Enforcement of Agency Subpoena/Petition to Preserve <input type="checkbox"/> CVRT - Civil Rights <input type="checkbox"/> COND - Condemnation/Eminent Domain/Right-of-Way <input type="checkbox"/> CTMP - Contempt of Court <input type="checkbox"/> CONT - Contract/Ejectment/Writ of Seizure <input type="checkbox"/> TOCN - Conversion <input type="checkbox"/> EQND - Equity Non-Damages Actions/Declaratory Judgment/Injunction Election Contest/Quiet Title/Sale For Division <input type="checkbox"/> CVUD - Eviction Appeal/Unlawful Detainer <input type="checkbox"/> FORJ - Foreign Judgment <input type="checkbox"/> FORF - Fruits of Crime Forfeiture <input type="checkbox"/> MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition <input type="checkbox"/> PFAB - Protection From Abuse <input type="checkbox"/> FELA - Railroad/Seaman (FELA) <input type="checkbox"/> RPRO - Real Property <input type="checkbox"/> WTEG - Will/Trust/Estate/Guardianship/Conservatorship <input type="checkbox"/> COMP - Workers' Compensation <input type="checkbox"/> CVXX - Miscellaneous Circuit Civil Case	
TORTS: PERSONAL INJURY <input type="checkbox"/> TOPE - Personal Property <input type="checkbox"/> TORE - Real Property	OTHER CIVIL FILINGS <input type="checkbox"/> ABAN - Abandoned Automobile <input type="checkbox"/> ACCT - Account & Nonmortgage <input type="checkbox"/> APAA - Administrative Agency Appeal <input type="checkbox"/> ADPA - Administrative Procedure Act <input type="checkbox"/> ANPS - Adults in Need of Protective Service	
ORIGIN: F <input checked="" type="checkbox"/> INITIAL FILING A <input type="checkbox"/> APPEAL FROM DISTRICT COURT O <input type="checkbox"/> OTHER R <input type="checkbox"/> REMANDED T <input type="checkbox"/> TRANSFERRED FROM OTHER CIRCUIT COURT		
HAS JURY TRIAL BEEN DEMANDED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <small>Note: Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P, for procedure)</small>		
RELIEF REQUESTED: <input checked="" type="checkbox"/> MONETARY AWARD REQUESTED <input type="checkbox"/> NO MONETARY AWARD REQUESTED		
ATTORNEY CODE: <div style="display: flex; justify-content: space-between;"> <div>SIM074</div> <div>12/18/2016 12:31:05 PM Date</div> <div>/s/ MARVIN EARL SIMPSON Signature of Attorney/Party filing this form</div> </div>		
MEDIATION REQUESTED: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNDECIDED		



ELECTRONICALLY FILED
12/18/2016 12:31 PM
68-CV-2016-900836.00
CIRCUIT COURT OF
JEFFERSON COUNTY, ALABAMA
KAREN DUNN BURKS, CLERK

KEIRSTON SIMPSON	§	IN THE CIRCUIT COURT OF
	§	JEFFERSON COUNTY, ALABAMA-
PLAINTIFF,	§	BESSEMER DIVISION
	§	
vs.	§	
	§	
GHEORGHE-CLOBANU and	§	
KEY LINE SOLUTIONS INC.,	§	
an INDIANA CORPORATION,	§	
	§	
DEFENDANTS	§	CIVIL ACTION No.

Complaint

Facts

1. Keirston Simpson is a citizen of the State of Alabama.
2. Gheorghe-Clobanu is a citizen of the State of Washington.
3. Key Line Solutions Inc. is a corporation incorporated under the laws of Indiana and has a principal place of business in Illinois.
4. The amount in controversy exceeds the jurisdictional minimum for this case.
5. On April 8, 2016, Keirston Simpson was operating a motor vehicle—in the slow lane—northbound on I20/59 near mile marker 110 in Bessemer, Alabama.
6. At the same time and place, Defendant Gheorghe-Clobanu was operating a commercial vehicle owned by Defendant Key Line Solutions Inc. traveling north—in the passing lane—on I20/59 near mile marker 110 in Bessemer, Alabama.
7. Defendant Gheorghe-Clobanu was an employee of Defendant Key Line Solution Inc. at the time of the truck accident.
8. At all times herein mentioned Plaintiff's vehicle was operated in a reasonable and prudent manner, with due caution and regard for motor vehicle laws of the State of Alabama.
9. Defendant Gheorghe-Clobanu failed to maintain control of his truck, crossed over the center line into Plaintiff's lane striking the Plaintiff's vehicle.

COUNT 1 – Negligence (Defendants Gheorghe-Clobanu and Key Line Solutions)

10. Plaintiff hereby incorporates paragraphs No. 1 through No. 9 of this Complaint fully as if the allegations were set forth fully herein.
11. Defendant Key Line Solutions Inc. is liable for the actions of their employee Gheorghe-Clobanu for acts committed while furthering the business interests of Defendant Key Line Solutions Inc.
12. Defendant Gheorghe-Clobanu had a duty to use due care and maintain his vehicle within his lane to avoid a collision.
13. Defendant Gheorghe-Clobanu breached that duty of care by failing to control the vehicle in order to avoid a collision, failing to maintain his vehicle in his travel lane and collided with Plaintiff's vehicle.

14. As a direct and proximate cause of the negligence of Defendant Gheorghe-Clobanu, Plaintiff suffered physical injuries, pain and suffering in the past and in the future, past medical expenses and future medical expenses.
15. All of the above damages were directly and proximately caused by the aforementioned negligence of Defendant Gheorghe-Clobanu and were incurred without contributory negligence on the part of the Plaintiff.

WHEREFORE, Plaintiff Keirston Simpson demands compensatory damages against Defendants Gheorghe-Clobanu and Defendant Key Line Solutions Inc., plus costs, pre-judgment, and post-judgment interest as this Court deems appropriate.

COUNT II – Wantonness (Defendants Gheorghe-Clobanu and Key Line Solutions Inc.)

16. Plaintiff hereby incorporates paragraphs No. 1 through No. 15 of this Complaint fully as if the allegations were set forth fully herein.
17. Defendants Gheorghe-Clobanu and Defendant Key Line Solutions Inc. had a duty to operate their truck in a way that was not a hazard to public safety.
18. Defendants Gheorghe-Clobanu and Defendant Key Line Solutions Inc. deliberately and recklessly operated a defective truck that posed a foreseeable threat to public safety.
19. As a direct and proximate cause of the wantonness of Defendants Gheorghe-Clobanu and Defendant Key Line Solutions Inc., Plaintiff suffered physical injuries, pain and suffering in the past and in the future, past medical expenses and future medical expenses.
20. All of the above damages were directly and proximately caused by the aforementioned wantonness of Defendant Gheorghe-Clobanu and Defendant Key Line Solutions Inc., and were incurred without contributory negligence or assumption of the risk on the part of the Plaintiff, or an opportunity for Plaintiff to avoid the accident.

WHEREFORE, Plaintiff Keirston Simpson demands punitive damages against Defendants Gheorghe-Clobanu and Key Line Solutions Inc. as this Court deems appropriate.

COUNT III – NEGLIGENT ENTRUSTMENT (Defendant Key Line Solutions)

21. Plaintiff hereby incorporates paragraphs No. 1 through 20 of this Complaint fully as if the allegations were set forth fully herein.
22. Injuries, harm, and damages were incurred by the Plaintiff as a result of Defendant Gheorghe-Clobanu's use of the vehicle owned by Defendant Key Line Solutions Inc. in a negligent and reckless manner; which because of youth, inexperience, and/or prior actions, Defendant Key Line Solutions Inc. knew or had reason to know, was likely and involved an unreasonable risk of harm to others while driving a truck.
23. Defendant Key Line Solutions Inc., as the employer of Defendant Gheorghe-Clobanu, had the right to permit and the power to prohibit the use of this truck by Defendant Gheorghe-Clobanu.
24. Defendant Key Line Solutions Inc. knew, or had reason to know, that Defendant Gheorghe-Clobanu because of youth, inexperience, and/or prior actions was likely to drive his truck in a negligent and reckless manner.

25. As a direct result of Defendant Key Line Solutions Inc. negligently entrusting Defendant Gheorghe-Clobanu, who operated said vehicle owned by Defendant Key Line Solutions Inc. in a negligent and reckless manner, the Plaintiff, without any contributory negligence, did suffer the injuries, damages, and harm previously enumerated in Count I of this Complaint.

WHEREFORE, Plaintiff Keirston Simpson demands compensatory damages against Defendant Key Line Solutions Inc. plus costs, pre-judgment, and post-judgment interest as this Court deems appropriate.

COUNT IV – NEGLIGENT HIRING AND RETENTION (Defendant Key Line Solutions)

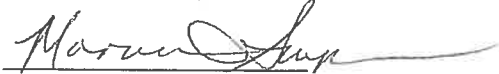
26. Plaintiff hereby incorporates paragraphs No. 1 through 25 of this Complaint fully as if the allegations were set forth fully herein.
27. Defendant Key Line Solutions Inc. had a duty to use reasonable care to select an employee who was competent and fit to perform the duties required as an employee. Defendant Key Line Solutions Inc. owed such duty to Plaintiff and such duty was breached.
28. Defendant Key Line Solutions Inc. knew, or should have known, that Defendant Gheorghe-Clobanu would be likely to operate a motor vehicle in a negligent and reckless manner.
29. Defendant Key Line Solutions Inc. knew, or should have known, that Defendant Gheorghe-Clobanu was not competent or fit for the duties required of him as an employee. Defendant Key Line Solutions Inc. breached their duty to use reasonable care to select and retain an employee that was competent and fit for the position.
30. As a result of the negligence of Defendant Key Line Solutions Inc. in hiring and retaining Defendant Gheorghe-Clobanu, Plaintiff was injured as alleged.

WHEREFORE, Plaintiff Keirston Simpson demands compensatory damages against Defendant Key Line Solutions Inc. plus costs, pre-judgment, and post-judgment interest as this Court deems appropriate.

PLAINTIFF REQUESTS FOR JURY TRIAL

Plaintiff, Keirston Simpson pursuant to Rule 38 of the Alabama Rules of Civil Procedure, prays a trial by jury on all issues.

Very respectfully submitted,



Marvin Simpson
Alabama State Bar # ASB-1442-I71S
P.O. Box 135
Dolomite, Alabama 35063
(205)908-2385



AlaFile E-Notice

68-CV-2016-900836.00

To: MARVIN EARL SIMPSON
mesimpson2917@att.net

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

KEIRSTON SIMPSON V. DENI KITEVSKI ET AL
68-CV-2016-900836.00

The following complaint was FILED on 12/18/2016 12:31:14 PM

Notice Date: 12/18/2016 12:31:14 PM

KAREN DUNN BURKS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
1851 2ND AVENUE NORTH
SUITE 130
BESSEMER, AL, 35020

205-497-8510
karen.burks@alacourt.gov



AlaFile E-Notice

68-CV-2016-900836.00

To: DENI KITEVSKI
8372 ASTER DRIVE, UNIT 3B
MERRILLVILLE, IN, 46410

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

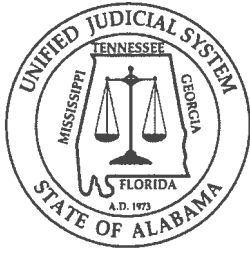
KEIRSTON SIMPSON V. DENI KITEVSKI ET AL
68-CV-2016-900836.00

The following complaint was FILED on 12/18/2016 12:31:14 PM

Notice Date: 12/18/2016 12:31:14 PM

KAREN DUNN BURKS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
1851 2ND AVENUE NORTH
SUITE 130
BESSEMER, AL, 35020

205-497-8510
karen.burks@alacourt.gov



AlaFile E-Notice

68-CV-2016-900836.00

To: GHEORGHE CLOBANU
2460 RUSSEL ROAD
KENT, IN, 98832

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

KEIRSTON SIMPSON V. DENI KITEVSKI ET AL
68-CV-2016-900836.00

The following complaint was FILED on 12/18/2016 12:31:14 PM

Notice Date: 12/18/2016 12:31:14 PM

KAREN DUNN BURKS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
1851 2ND AVENUE NORTH
SUITE 130
BESSEMER, AL, 35020

205-497-8510
karen.burks@alacourt.gov

State of Alabama Unified Judicial System Form C-34 Rev 6/88	SUMMONS - CIVIL -	Case Number: 68-CV-2016-900836.00
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IN THE CIRCUIT COURT OF JEFFERSON COUNTY
KEIRSTON SIMPSON V. DENI KITEVSKI ET AL

DENI KITEVSKI, 8372 ASTER DRIVE, UNIT 3B, MERRILLVILLE, IN 46410

NOTICE TO _____

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MARVIN EARL SIMPSON

WHOSE ADDRESS IS PO BOX 135, DOLOMITE, AL 35061

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of KEIRSTON SIMPSON

pursuant to the Alabama Rules of the Civil Procedure

Date 12/18/2016 12:31:14 PM /s/ KAREN DUNN BURKS

Clerk/Register

1851 2ND AVENUE NORTH

SUITE 130

BESSEMER, AL 35020

☒ Certified Mail is hereby requested /s/ MARVIN EARL SIMPSON

Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on _____

☐ I certify that I personally delivered a copy of the Summons and Complaint to _____

_____ in _____ County, Alabama on _____ (Date)

Date _____	Server's Signature _____	Address of Server _____
Type of Server _____	Server's Printed Name _____	Phone Number of Server _____

State of Alabama Unified Judicial System Form C-34 Rev 6/88	SUMMONS - CIVIL -	Case Number: 68-CV-2016-900836.00
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IN THE CIRCUIT COURT OF JEFFERSON COUNTY
 KEIRSTON SIMPSON V. DENI KITEVSKI ET AL

GHEORGHE CLOBANU, 2460 RUSSEL ROAD, KENT, IN 98832

NOTICE TO _____

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MARVIN EARL SIMPSON

WHOSE ADDRESS IS PO BOX 135, DOLOMITE, AL 35061

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of KEIRSTON SIMPSON

pursuant to the Alabama Rules of the Civil Procedure

Date 12/18/2016 12:31:14 PM /s/ KAREN DUNN BURKS

Clerk/Register

1851 2ND AVENUE NORTH

SUITE 130

BESSEMER, AL 35020

☒ Certified Mail is hereby requested /s/ MARVIN EARL SIMPSON

Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on _____

☐ I certify that I personally delivered a copy of the Summons and Complaint to _____

_____ in _____ County, Alabama on _____ (Date)

Date _____	Server's Signature _____	Address of Server _____
Type of Server _____	Server's Printed Name _____	_____
		Phone Number of Server _____



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12/18/2016 12:39 PM
68-CV-2016-900836.00
CIRCUIT COURT OF
JEFFERSON COUNTY, ALABAMA
KAREN DUNN BURKS, CLERK

IN THE CIRCUIT COURT FOR JEFFERSON COUNTY, ALABAMA- BESSEMER DIVISION

KEIRSTON SIMPSON

-PLAINTIFF

v

KEY LINE SOLUTION INC.;

-DEFENDANTS

CASE NO.

Request for Production of Documents

- a. Your written response shall state with respect to each item or category, that inspection-related activities will be permitted as requested, unless the request is refused, in which event the reasons for refusal shall be stated. If the refusal relates to part of an item or category, that part shall be specified.
- b. In accordance with the Alabama Rules, the documents shall be produced as they are maintained in the usual course of business or you shall organize and label them to correspond with the categories in the request.
- c. These requests shall encompass all items within your possession, custody or control.
- d. The requests are continuing in character so as to require you to promptly amend or supplement your response if you obtain further material information.
- e. If in responding to these requests you encounter any ambiguity in construing any request, instruction or definition, set forth the matter deemed ambiguous and the construction used in responding.
- f. If you are declining to produce any material requested on the basis of the attorney-client privilege, the work product doctrine, or any other claim of protection or privilege, you must provide the information required by Rule 34 of the Alabama Rules of Civil Procedure.

Definition

As used in these requests, the following terms are to be interpreted in accordance with these definitions.

- a. The term "person" includes any individual, joint stock company, unincorporated association or society, municipal or other corporation, state, which agencies or political subdivisions, and court, or any other governmental entity.
- b. The terms "you" or "your" include the persons to whom these requests are addressed, and all that person's agents, representatives or attorneys.

- c. In accordance with Alabama Rules, the terms, "document" or "documents" includes all writings, drawings, graphs, charts, photographs, recordings, and any other data computations from which information can be obtained, translated, if necessary by (you), through detection devices, into reasonably usable form.
- d. The term "occurrence" means the incident complained of in the Plaintiff's complaint.

Documents Regarding Defendant Driver

1. The entire personnel file of Defendant Gheorghe-Clobanu.
2. The entire human resources file of Defendant Gheorghe-Clobanu.
3. Defendant Gheorghe-Clobanu's employment application and any notes or documentation regarding his interview for employment.
4. The entire qualification file or any file regarding any investigation into the qualification of the Defendant Gheorghe-Clobanu before he was hired or retained.
5. Report received or generated regarding Defendant Gheorghe-Clobanu's safety record before Defendant Gheorghe-Clobanu was hired.
6. Reports received or generated regarding Defendant Gheorghe-Clobanu's safety record after he was hired.
7. Reports received or generated regarding Defendant Gheorghe-Clobanu's criminal background check before he was hired.
8. Defendant Gheorghe-Clobanu's driving record secured by this Defendant before he was hired.
9. Defendant Gheorghe-Clobanu's driving record secured by this Defendant at any time after he was hired.
10. Any documents regarding Defendant Gheorghe-Clobanu's employment history.
11. Documentation regarding any contact with any prior employers of Defendant Gheorghe-Clobanu prior to hiring Defendant Gheorghe-Clobanu.
12. All medical documentation in your possession regarding the health of Defendant Gheorghe-Clobanu including but not limited to any physicals, drug testing, vision testing, etc. or regarding Defendant Gheorghe-Clobanu's physical at any time while employed by this Defendant.
13. Any and all documents regarding any safety tests taken by Defendant Gheorghe-Clobanu.
14. The results of any safety tests taken by Defendant Gheorghe-Clobanu.
15. Any and all documents regarding any reprimands, criticisms, or complaints as to Defendant Gheorghe-Clobanu at any time he was employed by this Defendant.
16. A copy of Defendant Gheorghe-Clobanu's driver's license.
17. Documents regarding the completion, attempts or non-completion of any driving programs attended by Defendant Gheorghe-Clobanu.

18. The entire drug and alcohol file of Defendant Gheorghe-Clobanu including, but not limited to, pre-employment, post-occurrence, random, reasonable suspicion and return to duty drug and alcohol testing results.
19. Any and all payroll and benefit records for Defendant Gheorghe-Clobanu.
20. The entire safety performance file for Defendant Gheorghe-Clobanu.
21. Any and all records of health insurance claims, disability claims, sickness or doctors' excuses or the entire medical records chart of the Defendant Gheorghe-Clobanu for three (3) days after the collision.
22. All logs-official or unofficial-of Defendant Gheorghe-Clobanu for six (6) months prior to and three (30) days after the collision.
23. Any and all state safety audits of Defendant Gheorghe-Clobanu.
24. Any and all federal occurrence reports filed by Defendant Gheorghe-Clobanu for the year 2016 and for three (3) years prior to the occurrence.
25. All of the records of Defendant Gheorghe-Clobanu for the seven (7) days prior to the occurrence and for the day of the occurrence, which documents you are required to retain under 49 C.F.R. §395.8 (k) and subsequent DOT guidance and interpretation of "supporting documents":
 1. Bills of lading;
 2. Carrier pros;
 3. Freight bills;
 4. Dispatch records;
 5. Driver call-in records;
 6. Gate record receipts;
 7. Weight/scale tickets;
 8. Fuel billing statements;
 9. Toll receipts;
 10. International registration plan receipts;
 11. International fuel tax agreement receipts;
 12. Trip permits;
 13. Lessor settlement sheets;
 14. Port of entry receipts;
 15. Cash advance receipts;
 16. Delivery receipts;
 17. Lumper receipts;
 18. Interchange and inspection reports;
 19. Over/short and damage reports;
 20. Agricultural inspection reports;
 21. Commercial Vehicle Safety Alliance reports;

22. Occurrence reports;
 23. Telephone billing statements;
 24. Credit card receipts;
 25. On-board computer reports;
 26. Border crossing reports;
 27. Custom decelerations;
 28. Traffic citations;
 29. Overweight/oversize reports and citations; and/or
 30. Other documents directly related to the motor carrier's operation which are retained by the motor carrier in connection with the operation of its transportation business.
26. Any and all cellular and telephone records, including bills of Defendant Gheorghe-Clobanu for the day of the occurrence and seven (7) days prior and seven (7) days after.
 27. Copies of any and all fuel tax reports of Defendant Gheorghe-Clobanu for the month of the occurrence.
 28. Any and all DOT inspection reports filed by Defendant Gheorghe-Clobanu for the year of the occurrence and three (3) years prior.
 29. Any and all long for DOT physicals of Defendant Gheorghe-Clobanu.
 30. Any and all Seven Day Prior Forms or Eight Day Prior Forms for Defendant Gheorghe-Clobanu for the month of this collision.
 31. Any documents in your possession regarding any insurance coverage for Defendant Gheorghe-Clobanu.
 32. Produce any other file or documents regarding Defendant Gheorghe-Clobanu not previously mentioned above.

Documents Relative to the Vehicle Involved

1. Any and all DOT and State inspections of the vehicle involved in the occurrence for the year of the occurrence and one (1) year prior.
2. Produce copies of any and all satellite communications and e-mail for the day of the occurrence and seven days prior, as well as all recorded ECM data with reference to all data available, including:
 - a. trip distance;
 - b. total vehicle driving time;
 - c. load factor;
 - d. vehicle speed limit;
 - e. maximum vehicle speed recorded;
 - f. number of hard brake incidents;
 - g. current engine speed (rpm);

- h. maximum and minimum cruise speed limits;
- i. total vehicle driving distance;
- j. fuel consumption (gal./hr.);
- k. idle time;
- l. engine governed speed;
- m. maximum engine speed recorded;
- n. current throttle position;
- o. brake switch status (on/off);
- p. odometer;
- q. trip driving time;
- r. fuel economy (MPG);
- s. average driving speed;
- t. number of engine overspeeds;
- u. number of vehicle overspeeds;
- v. current vehicle speed (MPH);
- w. clutch switch status (on/off); and
- x. clock.

EXPERT WITNESS DOCUMENTATION

1. All notes, correspondences, bills, invoices, diagrams, photographs, x-rays or other documents prepared or reviewed by each person whom you expect to call as an expert witness at trial.
2. All written reports of each person whom you expect to call as an expert witness at trial, including any drafts.
3. All documents upon which any expert witness you intend to call at trial relied to form an opinion.
4. All invoices generated by expert witnesses for performing all expert witness services to Defendants, including but not limited to, the fee for the medical examination, the records review, the pretrial preparation, any telephone conference, any trial testimony anticipated and any other fee paid by the Defendants for expert fees.
5. Any and all correspondence exchanged between counsel for this Defendant and any expert.
6. Any expert's current fee schedule.
7. The most recent resume or curriculum vitae of each expert whom you expect to call as an expert at trial.
8. Any list kept by an expert and that experts' testimony by way of deposition or trial testimony.

9. Any and all 1099 forms for any expert that demonstrates the source(s) of payment(s) to the expert, or the expert's practice, from any insurance company or defense law firm that compensated the doctor for any forensic work, performed in the last three years at the request of any defense law firm or insurance company.
10. Any and all Quickbooks or other similar accounting tools used to document sources of payments made to the expert's practice, from any insurance company or defense law firm that compensated the doctor for any forensic work performed in the last three years at the request of any defense law firm or insurance company.
11. Any and all tax returns for any expert that demonstrates the source(s) of payment(s) to the doctor from any insurance company or defense law firm that compensated the doctor for any forensic work performed in the last three years at the request of any defense law firm or insurance company. All other personal information is NOT requested and may be redacted.

Contracts and Leases

1. Any lease agreements and/or contracts that were in effect at the time of the occurrence between this Defendant and any other Defendant or entity regarding the scope and use of the vehicle involved in the occurrence.
2. Any contracts between this Defendant and any other Defendant or entity regarding indemnification or contribution for claims arising out of the occurrence.
3. Any releases, Mary Carter agreements, or any other documents which serve to limit, reduce or modify your potential liability in this matter or your potential joint and several share of any judgment that may be entered in this matter.
4. Any documentation regarding the existence of insurance coverage for the occurrence, any reservation of rights, or any other documents regarding any diminution or modification of any insurance coverage that may potentially cover any judgment entered as a result of the occurrence.

General Document Requests

1. Any document prepared during the regular course of business as a result of the occurrence complained of in Plaintiff's Complaint.
2. Any photographs taken regarding the vehicles, the scene, or any other matter relevant to the occurrence.
3. Any video surveillance or imaging of the Plaintiff.
4. The employee handbook issued to Defendant Gheorghe-Clobanu,
5. Any safety manuals in effect at the time of the occurrence.
6. Any driver's manuals in effect at the time of the occurrence.

7. All insurance policies including liability, general liability, excess umbrella for the vehicle, and any other insurance that will, or may, cover the occurrence.
8. A copy of the driver's manual or handbook issued to Defendant Gheorghe-Clobanu.
9. All documents identified in your Answers to Interrogatories as well as any documents provided by any party to this lawsuit in their Answers to Interrogatories.
10. All written, recorded, or signed statements of any party, including the Plaintiff, Defendants, witnesses, investigators or agents, representatives or employees of the parties concerning the subject matter of this action
11. All photographs, videotapes or audio tapes, x-rays, diagrams, medical records, surveys or other graphic representations of information concerning the subject matter of this action, the Plaintiff or property damage.
12. Any documents received pursuant to any subpoena requests.
13. Copies of any treatise, standards in the industry, legal authority, rule, case, statute or code that will be relied upon in the defense of this case.

Marvin Simpson

The Simpson Law Office LLC.
P.O. Box 135
Dolomite, Alabama 35063
(205)908-2385

Attorney for Plaintiff



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CIRCUIT COURT OF
JEFFERSON COUNTY, ALABAMA
KAREN DUNN BURKS, CLERK

IN THE CIRCUIT COURT FOR JEFFERSON COUNTY, ALABAMA-BESSEMER DIVISION

KEIRSTON SIMPSON-PLAINTIFF

v.

GHEORGHE-CLOBANU-DEFENDANT

CASE NO.

PLAINTIFF'S INTERROGATORIES TO DEFENDANT TRUCK DRIVER

TO: Defendant Gheorghe-Clobanu

BY: Plaintiff Keirston Simpson

Plaintiff, by and through his attorneys, Marvin Simpson and The Simpson Law Office, LLC, requests that Defendant (Defendant Gheorghe-Clobanu) answer the following interrogatories fully, under oath and in accordance with Rule 26 of the Alabama Rules of Civil Procedure, subject to the instructions set forth below.

Instructions

- a. These Interrogatories are continuing in character so as to require you to file supplementary answers if you obtain further or different information before trial.
- b. Unless otherwise stated, these interrogatories refer to the time, place and circumstances of the occurrence mentioned or complained of in the Complaint.
- c. Where name an identity of a person is required, please state full name, home address and also business address, if known.
- d. Where knowledge or information in possession of a party is requested, such request includes knowledge of the party's agents, representatives, and unless privileged, his attorneys. When answer is made by corporate defendant, state the name, address and title of persons supplying the information and making the affidavit, and announce the source of his or her information.
- e. The pronoun "you" refers to the party to whom the Interrogatories are addressed and the parties mentioned in clause (d).
- f. "Identify" when referring to an individual, corporation or other entity shall mean to set forth the name and telephone number and, if a corporation or other entity, its principle place of business or, if an individual, the present or last known home address, his or her job title or titles, by whom employed and address of the place of employment.

INTERROGATORIES

1. State your full name, home addresses for the past ten years, your employer for the last 10 years, your current work address, date of birth and social security number.
2. Identify all insurance carriers or self-insured funds, by name, address, policy numbers and policy limits, for any insurance policy or fund which may provide coverage for any judgment entered against you related to this occurrence. If you are aware of any indemnification or contribution agreements between any of the Defendants, please identify those agreements.
3. If you contend that any other entity or person, including any of the parties or the Plaintiff, was responsible for the automobile collision and Plaintiff injuries, identify such

- person(s) or entities, and give a concise statement of the facts upon which you rely in support of your contention.
4. State the name, business address, home address, telephone number, and area of expertise of all experts whom you propose to call as witnesses at trial or whose opinions you intend to utilize at the trial of this matter. For each expert state the amount of compensation paid, the subject matter on which the expert is expected to testify, the expert's opinions and the factual basis for their opinions.
 5. Identify and documents and recordings including, but not limited to, pictures, photographs, PowerPoint presentations for use at trial, demonstrative exhibits, computer generated exhibits, electronically stored data, visual aids, overlays, employment records, plats, visual recorded images, audio recordings, cassette tapes, transcripts of testimony, diagrams and objects relative to the occurrence, the scene of the occurrence., the scene of the occurrence. Plaintiff's physical condition or statements made by any party or witness. Identify the substance of the item, the date obtained, what is depicted with the item, and the name and address of the present custodian of each item.
 6. If you, your insurance carrier, private investigator, or any other person or entity is in possession of any written, oral or recorded statements by any party or person with personal knowledge relative to the occurrence, indicate the date and time each statement was obtained, the name and address of each person who provided the statement, the contents of the statement, and the name and address of the current custodian of the statement.
 7. Describe any conduct, comment, conversation, statement, or report made by this Plaintiff or any other person, at the scene of the occurrence or at any time, concerning fault for the occurrence or facts relevant to any issue in this case. Include in your answer where the conduct, comment, conversation, or statement took place, and in whose presence it was made/observed, as well as the name of the author of such statement, the present custodian of the statement and the address for the custodian.
 8. Since your eighteenth birthday, when you were represented by an attorney or waived the right to be represented by and attorney, state whether you have been found guilty of, or plead guilty to, any crimes other than minor traffic violations (i.e., those traffic offenses without the potential penalty of incarceration) and, if so state the nature of the offense, the date of each conviction, and the full name of the court where each conviction was entered.
 9. State whether you, the driver of your vehicle, or any witness to the incident consumed any alcoholic beverages or drugs, whether prescription over-the-counter or illicit, within twenty-four (24) hours prior to the occurrence. If the answer is in the affirmative, identify the individual, state the name of the substance, where and when it was obtained and consumed, and the amount thereof.
 10. Identify any person who has personal knowledge of the facts and circumstances of this case and any person you intend to call as a witness at the trial, including investigators or any individual who was an eyewitness, or claims to be and eyewitness, regarding all or part of the occurrence including, but not limited to, passengers in your vehicle, passengers in Plaintiffs vehicle, and persons who arrived at the scene after the accident.

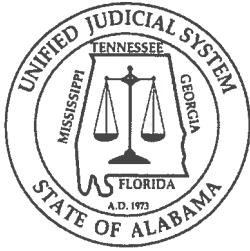
- State in your answer the name, address, current telephone number, substance of their knowledge, expected testimony and any lay opinions
11. Give a detailed statement of how you contend the occurrence took place, including where you were traveling from and traveling to, any stops made along the way, the date, time, location of the accident, the direction of each vehicle before the accident the path of each vehicle leading up to the accident, the speed of the vehicles upon impact, the resting place of each of the vehicles, and the status of any traffic control devices at the location of the accident. If this was a chain reaction accident, identify the sequence of the impacts between the vehicles.
 12. State whether you were the driver and/or owner of the vehicle involved in the occurrence on the date, time and location as outlined in Plaintiffs Complaint. If you were not the driver, then state who you claim was driving the vehicle that collided with the Plaintiffs vehicle, including the driver's name, address, telephone number and the basis for this knowledge. If you were not the owner, then state the name and address of the owner, whether you had the permission of the owner to operate the vehicle, whether there were any restriction placed on your use of the vehicle, and the purpose for which you were operating the vehicle.
 13. Identify your employer and the nature of the work you were performing at the time of the incident.
 14. Subsequent to the collision mentioned in Plaintiffs Complaint, were you tested, examined, or treated by any medical facility or medical personnel, including but not limited to drug testing by your employer? If your answer is in the affirmative, state:
 - a. the name and address of the medical care provider or facility;
 - b. the nature of your injuries;
 - c. the nature of your examination, including x-rays, MRIs, blood tests, and the results thereof;
 - d. the duration of your stay in the hospital or medical care facility; and
 - e. whether you missed any time from your employment as a result of the injuries you received in the occurrence and, if so, a statement of the time missed.
 15. If any blood, breath or urine tests were done, state:
 - a. Each person from whom a blood sample or breath sample was taken;
 - b. the name, address and occupation of the person who drew each sample;
 - c. the name, address and occupation of the person who conducted the tests on each sample;
 - d. the time and date on which each sample was drawn;
 - e. the time and date on which tests were conducted; and
 - f. the results of the tests.
 16. Please list every civil, criminal and administrative matter wherein you were a party to include the complete caption, nature of the case, the case number, state, city, county and state where action was located and name and address of all parties and their attorneys.
 17. If you contend any of the medical treatment received by the Plaintiff was unreasonable or unnecessary or any of the bills for the medical treatment were unreasonable or

unnecessary, or any of the bills for the medical treatment were unreasonable or excessive, please state the factual basis for this contention and identify each specific date of treatment and each medical bill that you claim was unreasonable/unnecessary; and identify all witnesses who will provide testimony on this issue to include any expert witnesses and their opinions.

18. Indicate any injury, disability, illness, medical, and/or psychological condition which you suffered on the date of the occurrence (prior to and immediately following the collision) and the medications (type and quantity) you were prescribed and taking (this includes, but is not limited to, any blindness, corrective lenses to improve eyesight, loss or reduction of hearing, use of prosthetic devices, wearing any type of body/arm/leg cast, an inability to speak, color blindness, and dyslexia); if you contend any of these conditions prevented you from operating your vehicle in a safe and prudent manner on the date of the automobile collision and caused you to collide with the Plaintiffs vehicle then detail all facts to support this contention, including the name, title and address of any proposed witness, and the details of the expected testimony of each witness you intend to call in support of this contention.
19. Please state the name, current address, phone number, and relationship to you of:
 - a. every person in the vehicle with you at time of the occurrence complained of;
 - b. every person, company, corporation or entity that may claim total or partial ownership in the vehicle in which you were operating at the time of the occurrence; and
 - c. any and all individuals listed on the insurance policy covering the vehicle in which you were operating at the time of the occurrence.

The Simpson Law Office, LLC.

Marvin Simpson
P.O. Box 135
Dolomite, AL 35063
(205)908-2385
Attorney for Plaintiff



AlaFile E-Notice

68-CV-2016-900836.00

To: MARVIN EARL SIMPSON
mesimpson2917@att.net

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

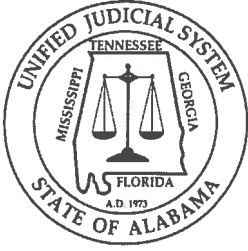
KEIRSTON SIMPSON V. DENI KITEVSKI ET AL
68-CV-2016-900836.00

The following discovery was FILED on 12/18/2016 12:39:11 PM

Notice Date: 12/18/2016 12:39:11 PM

KAREN DUNN BURKS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
1851 2ND AVENUE NORTH
SUITE 130
BESSEMER, AL, 35020

205-497-8510
karen.burks@alacourt.gov



AlaFile E-Notice

68-CV-2016-900836.00

To: KITEVSKI DENI (PRO SE)
8372 ASTER DRIVE, UNIT 3B
MERRILLVILLE, IN, 46410-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

KEIRSTON SIMPSON V. DENI KITEVSKI ET AL
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karen.burks@alacourt.gov



AlaFile E-Notice

68-CV-2016-900836.00

To: CLOBANU GHEORGHE (PRO SE)
2460 RUSSEL ROAD
KENT, IN, 98832-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

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205-497-8510
karen.burks@alacourt.gov



KEIRSTON SIMPSON	§	IN THE CIRCUIT COURT OF
	§	JEFFERSON COUNTY, ALABAMA-
PLAINTIFF,	§	BESSEMER DIVISION
	§	
vs.	§	
	§	
GHEORGHE-CLOBANU and	§	
KEY LINE SOLUTIONS INC.,	§	
an INDIANA CORPORATION,	§	
	§	
DEFENDANTS	§	CIVIL ACTION No.

Complaint

Facts

1. Keirston Simpson is a citizen of the State of Alabama.
2. Gheorghe-Clobanu is a citizen of the State of Washington.
3. Key Line Solutions Inc. is a corporation incorporated under the laws of Indiana and has a principal place of business in Illinois.
4. The amount in controversy exceeds the jurisdictional minimum for this case.
5. On April 8, 2016, Keirston Simpson was operating a motor vehicle—in the slow lane—northbound on I20/59 near mile marker 110 in Bessemer, Alabama.
6. At the same time and place, Defendant Gheorghe-Clobanu was operating a commercial vehicle owned by Defendant Key Line Solutions Inc. traveling north—in the passing lane—on I20/59 near mile marker 110 in Bessemer, Alabama.
7. Defendant Gheorghe-Clobanu was an employee of Defendant Key Line Solution Inc. at the time of the truck accident.
8. At all times herein mentioned Plaintiff's vehicle was operated in a reasonable and prudent manner, with due caution and regard for motor vehicle laws of the State of Alabama.
9. Defendant Gheorghe-Clobanu failed to maintain control of his truck, crossed over the center line into Plaintiff's lane striking the Plaintiff's vehicle.

COUNT 1 – Negligence (Defendants Gheorghe-Clobanu and Key Line Solutions)

10. Plaintiff hereby incorporates paragraphs No. 1 through No. 9 of this Complaint fully as if the allegations were set forth fully herein.
11. Defendant Key Line Solutions Inc. is liable for the actions of their employee Gheorghe-Clobanu for acts committed while furthering the business interests of Defendant Key Line Solutions Inc.
12. Defendant Gheorghe-Clobanu had a duty to use due care and maintain his vehicle within his lane to avoid a collision.
13. Defendant Gheorghe-Clobanu breached that duty of care by failing to control the vehicle in order to avoid a collision, failing to maintain his vehicle in his travel lane and collided with Plaintiff's vehicle.

14. As a direct and proximate cause of the negligence of Defendant Gheorghe-Clobanu, Plaintiff suffered physical injuries, pain and suffering in the past and in the future, past medical expenses and future medical expenses.
15. All of the above damages were directly and proximately caused by the aforementioned negligence of Defendant Gheorghe-Clobanu and were incurred without contributory negligence on the part of the Plaintiff.

WHEREFORE, Plaintiff Keirston Simpson demands compensatory damages against Defendants Gheorghe-Clobanu and Defendant Key Line Solutions Inc., plus costs, pre-judgment, and post-judgment interest as this Court deems appropriate.

COUNT II – Wantonness (Defendant Gheorghe-Clobanu and Defendant Key Line Solutions Inc.)

16. Plaintiff hereby incorporates paragraphs No. 1 through No. 15 of this Complaint fully as if the allegations were set forth fully herein.
17. Defendant Gheorghe-Clobanu and Defendant Key Line Solutions Inc. had a duty to operate their truck in a way that was not a hazard to public safety.
18. Defendant Gheorghe-Clobanu and Defendant Key Line Solutions Inc. deliberately and recklessly operated a defective truck that posed a foreseeable threat to public safety.
19. As a direct and proximate cause of the wantonness of Defendant Gheorghe-Clobanu and Defendant Key Line Solutions Inc., Plaintiff suffered physical injuries, pain and suffering in the past and in the future, past medical expenses and future medical expenses.
20. All of the above damages were directly and proximately caused by the aforementioned wantonness of Defendant Gheorghe-Clobanu and Defendant Key Line Solutions Inc., and were incurred without contributory negligence or assumption of the risk on the part of the Plaintiff, or an opportunity for Plaintiff to avoid the accident.

WHEREFORE, Plaintiff Keirston Simpson demands punitive damages against Defendants Gheorghe-Clobanu and Key Line Solutions Inc. as this Court deems appropriate.

COUNT III – NEGLIGENCE ENTRUSTMENT (Defendant Key Line Solutions)

21. Plaintiff hereby incorporates paragraphs No. 1 through 20 of this Complaint fully as if the allegations were set forth fully herein.
22. Injuries, harm, and damages were incurred by the Plaintiff as a result of Defendant Gheorghe-Clobanu's use of the vehicle owned by Defendant Key Line Solutions Inc. in a negligent and reckless manner; which because of youth, inexperience, and/or prior actions, Defendant Key Line Solutions Inc. knew or had reason to know, was likely and involved an unreasonable risk of harm to others while driving a truck.
23. Defendant Key Line Solutions Inc., as the employer of Defendant Gheorghe-Clobanu, had the right to permit and the power to prohibit the use of this truck by Defendant Gheorghe-Clobanu.
24. Defendant Key Line Solutions Inc. knew, or had reason to know, that Defendant Gheorghe-Clobanu because of youth, inexperience, and/or prior actions was likely to drive his truck in a negligent and reckless manner.

25. As a direct result of Defendant Key Line Solutions Inc. negligently entrusting Defendant Gheorghe-Clobanu, who operated said vehicle owned by Defendant Key Line Solutions Inc. in a negligent and reckless manner, the Plaintiff, without any contributory negligence, did suffer the injuries, damages, and harm previously enumerated in Count I of this Complaint.

WHEREFORE, Plaintiff Keirston Simpson demands compensatory damages against Defendant Key Line Solutions Inc. plus costs, pre-judgment, and post-judgment interest as this Court deems appropriate.

COUNT IV – NEGLIGENT HIRING AND RETENTION (Defendant Key Line Solutions)

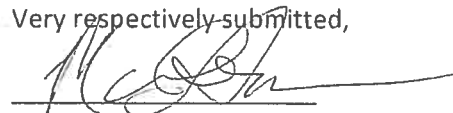
26. Plaintiff hereby incorporates paragraphs No. 1 through 25 of this Complaint fully as if the allegations were set forth fully herein.
27. Defendant Key Line Solutions Inc. had a duty to use reasonable care to select an employee who was competent and fit to perform the duties required as an employee. Defendant Key Line Solutions Inc. owed such duty to Plaintiff and such duty was breached.
28. Defendant Key Line Solutions Inc. knew, or should have known, that Defendant Gheorghe-Clobanu would be likely to operate a motor vehicle in a negligent and reckless manner.
29. Defendant Key Line Solutions Inc. knew, or should have known, that Defendant Gheorghe-Clobanu was not competent or fit for the duties required of him as an employee. Defendant Key Line Solutions Inc. breached their duty to use reasonable care to select and retain an employee that was competent and fit for the position.
30. As a result of the negligence of Defendant Key Line Solutions Inc. in hiring and retaining Defendant Gheorghe-Clobanu, Plaintiff was injured as alleged.

WHEREFORE, Plaintiff Keirston Simpson demands compensatory damages against Defendant Key Line Solutions Inc. plus costs, pre-judgment, and post-judgment interest as this Court deems appropriate.

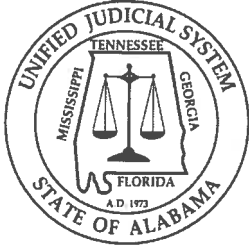
PLAINTIFF REQUESTS FOR JURY TRIAL

Plaintiff, Keirston Simpson pursuant to Rule 38 of the Alabama Rules of Civil Procedure, prays a trial by jury on all issues.

Very respectfully submitted,



Marvin Simpson
Alabama State Bar # ASB-1442-I71S
P.O. Box 135
Dolomite, Alabama 35063
(205)908-2385



AlaFile E-Notice

68-CV-2016-900836.00

To: MARVIN EARL SIMPSON
mesimpson2917@att.net

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

KEIRSTON SIMPSON V. DENI KITEVSKI ET AL
68-CV-2016-900836.00

The following complaint was FILED on 12/19/2016 11:44:58 AM

Notice Date: 12/19/2016 11:44:58 AM

KAREN DUNN BURKS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
1851 2ND AVENUE NORTH
SUITE 130
BESSEMER, AL, 35020

205-497-8510
karen.burks@alacourt.gov



AlaFile E-Notice

68-CV-2016-900836.00

To: KITEVSKI DENI (PRO SE)
8372 ASTER DRIVE, UNIT 3B
MERRILLVILLE, IN, 46410-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

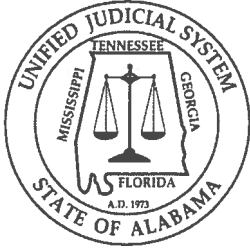
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karen.burks@alacourt.gov



AlaFile E-Notice

68-CV-2016-900836.00

To: CLOBANU GHEORGHE (PRO SE)
2460 RUSSEL ROAD
KENT, WA, 98832-0000

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

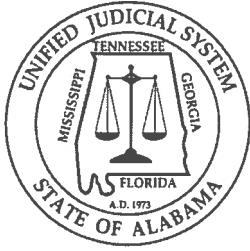
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karen.burks@alacourt.gov



AlaFile E-Notice

68-CV-2016-900836.00

To: GHEORGHE CLOBANU
2460 RUSSEL ROAD
KENT, WA, 98832

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

KEIRSTON SIMPSON V. DENI KITEVSKI ET AL
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AlaFile E-Notice

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To: DENI KITEVSKI
8372 ASTER DRIVE, UNIT 3B
MERRILLVILLE, IN, 46410

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KEIRSTON SIMPSON V. DENI KITEVSKI ET AL
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karen.burks@alacourt.gov

State of Alabama Unified Judicial System Form C-34 Rev 6/88	SUMMONS - CIVIL -	Case Number: 68-CV-2016-900836.00
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IN THE CIRCUIT COURT OF JEFFERSON COUNTY
 KEIRSTON SIMPSON V. DENI KITEVSKI ET AL

GHEORGHE CLOBANU, 2460 RUSSEL ROAD, KENT, WA 98832

NOTICE TO _____

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MARVIN EARL SIMPSON

WHOSE ADDRESS IS PO BOX 135, DOLOMITE, AL 35061

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of SIMPSON KEIRSTON

pursuant to the Alabama Rules of the Civil Procedure

Date 12/19/2016 11:44:58 AM /s/ KAREN DUNN BURKS

Clerk/Register

1851 2ND AVENUE NORTH

SUITE 130

BESSEMER, AL 35020

☒ Certified Mail is hereby requested /s/ MARVIN EARL SIMPSON

Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on _____

☐ I certify that I personally delivered a copy of the Summons and Complaint to _____

_____ in _____ County, Alabama on _____ (Date)

Date _____	Server's Signature _____	Address of Server _____
Type of Server _____	Server's Printed Name _____	_____
		Phone Number of Server _____

State of Alabama Unified Judicial System Form C-34 Rev 6/88	SUMMONS - CIVIL -	Case Number: 68-CV-2016-900836.00
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IN THE CIRCUIT COURT OF JEFFERSON COUNTY
 KEIRSTON SIMPSON V. DENI KITEVSKI ET AL

DENI KITEVSKI, 8372 ASTER DRIVE, UNIT 3B, MERRILLVILLE, IN 46410

NOTICE TO _____

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY MARVIN EARL SIMPSON

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Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on _____

☐ I certify that I personally delivered a copy of the Summons and Complaint to _____

_____ in _____ County, Alabama on _____ (Date)

Date _____

Server's Signature _____

Address of Server _____

Type of Server _____

Server's Printed Name _____

Phone Number of Server _____



ELECTRONICALLY FILED
12/19/2016 12:59 PM
68-CV-2016-900836.00
CIRCUIT COURT OF
JEFFERSON COUNTY, ALABAMA
KAREN DUNN BURKS, CLERK

KEIRSTON SIMPSON	§	IN THE CIRCUIT COURT OF
	§	JEFFERSON COUNTY, ALABAMA-
PLAINTIFF,	§	BESSEMER DIVISION
	§	
vs.	§	
	§	
GHEORGHE-CLOBANU and	§	
KEY LINE SOLUTIONS INC.,	§	
an INDIANA CORPORATION,	§	
	§	
DEFENDANTS	§	CIVIL ACTION No.

Complaint

Facts

1. Keirston Simpson is a citizen of the State of Alabama.
2. Gheorghe-Clobanu is a citizen of the State of Washington.
3. Key Line Solutions Inc. is a corporation incorporated under the laws of Indiana and has a principal place of business in Illinois.
4. The amount in controversy exceeds the jurisdictional minimum for this case.
5. On April 8, 2016, Keirston Simpson was operating a motor vehicle—in the slow lane—northbound on I20/59 near mile marker 110 in Bessemer, Alabama.
6. At the same time and place, Defendant Gheorghe-Clobanu was operating a commercial vehicle owned by Defendant Key Line Solutions Inc. traveling north—in the passing lane—on I20/59 near mile marker 110 in Bessemer, Alabama.
7. Defendant Gheorghe-Clobanu was an employee of Defendant Key Line Solution Inc. at the time of the truck accident.
8. At all times herein mentioned Plaintiff's vehicle was operated in a reasonable and prudent manner, with due caution and regard for motor vehicle laws of the State of Alabama.
9. Defendant Gheorghe-Clobanu failed to maintain control of his truck, crossed over the center line into Plaintiff's lane striking the Plaintiff's vehicle.

COUNT 1 – Negligence (Defendants Gheorghe-Clobanu and Key Line Solutions)

10. Plaintiff hereby incorporates paragraphs No. 1 through No. 9 of this Complaint fully as if the allegations were set forth fully herein.
11. Defendant Key Line Solutions Inc. is liable for the actions of their employee Gheorghe-Clobanu for acts committed while furthering the business interests of Defendant Key Line Solutions Inc.
12. Defendant Gheorghe-Clobanu had a duty to use due care and maintain his vehicle within his lane to avoid a collision.
13. Defendant Gheorghe-Clobanu breached that duty of care by failing to control the vehicle in order to avoid a collision, failing to maintain his vehicle in his travel lane and collided with Plaintiff's vehicle.

14. As a direct and proximate cause of the negligence of Defendant Gheorghe-Clobanu, Plaintiff suffered physical injuries, pain and suffering in the past and in the future, past medical expenses and future medical expenses.
15. All of the above damages were directly and proximately caused by the aforementioned negligence of Defendant Gheorghe-Clobanu and were incurred without contributory negligence on the part of the Plaintiff.

WHEREFORE, Plaintiff Keirston Simpson demands compensatory damages against Defendants Gheorghe-Clobanu and Defendant Key Line Solutions Inc., plus costs, pre-judgment, and post-judgment interest as this Court deems appropriate.

COUNT II – Wantonness (Defendant Gheorghe-Clobanu and Defendant Key Line Solutions Inc.)

16. Plaintiff hereby incorporates paragraphs No. 1 through No. 15 of this Complaint fully as if the allegations were set forth fully herein.
17. Defendant Gheorghe-Clobanu and Defendant Key Line Solutions Inc. had a duty to operate their truck in a way that was not a hazard to public safety.
18. Defendant Gheorghe-Clobanu and Defendant Key Line Solutions Inc. deliberately and recklessly operated a defective truck that posed a foreseeable threat to public safety.
19. As a direct and proximate cause of the wantonness of Defendant Gheorghe-Clobanu and Defendant Key Line Solutions Inc., Plaintiff suffered physical injuries, pain and suffering in the past and in the future, past medical expenses and future medical expenses.
20. All of the above damages were directly and proximately caused by the aforementioned wantonness of Defendant Gheorghe-Clobanu and Defendant Key Line Solutions Inc., and were incurred without contributory negligence or assumption of the risk on the part of the Plaintiff, or an opportunity for Plaintiff to avoid the accident.

WHEREFORE, Plaintiff Keirston Simpson demands punitive damages against Defendants Gheorghe-Clobanu and Key Line Solutions Inc. as this Court deems appropriate.

COUNT III – NEGLIGENT ENTRUSTMENT (Defendant Key Line Solutions)

21. Plaintiff hereby incorporates paragraphs No. 1 through 20 of this Complaint fully as if the allegations were set forth fully herein.
22. Injuries, harm, and damages were incurred by the Plaintiff as a result of Defendant Gheorghe-Clobanu's use of the vehicle owned by Defendant Key Line Solutions Inc. in a negligent and reckless manner; which because of youth, inexperience, and/or prior actions, Defendant Key Line Solutions Inc. knew or had reason to know, was likely and involved an unreasonable risk of harm to others while driving a truck.
23. Defendant Key Line Solutions Inc., as the employer of Defendant Gheorghe-Clobanu, had the right to permit and the power to prohibit the use of this truck by Defendant Gheorghe-Clobanu.
24. Defendant Key Line Solutions Inc. knew, or had reason to know, that Defendant Gheorghe-Clobanu because of youth, inexperience, and/or prior actions was likely to drive his truck in a negligent and reckless manner.

25. As a direct result of Defendant Key Line Solutions Inc. negligently entrusting Defendant Gheorghe-Clobanu, who operated said vehicle owned by Defendant Key Line Solutions Inc. in a negligent and reckless manner, the Plaintiff, without any contributory negligence, did suffer the injuries, damages, and harm previously enumerated in Count I of this Complaint.

WHEREFORE, Plaintiff Keirston Simpson demands compensatory damages against Defendant Key Line Solutions Inc. plus costs, pre-judgment, and post-judgment interest as this Court deems appropriate.

COUNT IV – NEGLIGENT HIRING AND RETENTION (Defendant Key Line Solutions)

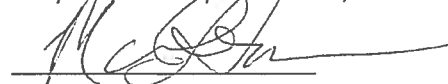
26. Plaintiff hereby incorporates paragraphs No. 1 through 25 of this Complaint fully as if the allegations were set forth fully herein.
27. Defendant Key Line Solutions Inc. had a duty to use reasonable care to select an employee who was competent and fit to perform the duties required as an employee. Defendant Key Line Solutions Inc. owed such duty to Plaintiff and such duty was breached.
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29. Defendant Key Line Solutions Inc. knew, or should have known, that Defendant Gheorghe-Clobanu was not competent or fit for the duties required of him as an employee. Defendant Key Line Solutions Inc. breached their duty to use reasonable care to select and retain an employee that was competent and fit for the position.
30. As a result of the negligence of Defendant Key Line Solutions Inc. in hiring and retaining Defendant Gheorghe-Clobanu, Plaintiff was injured as alleged.

WHEREFORE, Plaintiff Keirston Simpson demands compensatory damages against Defendant Key Line Solutions Inc. plus costs, pre-judgment, and post-judgment interest as this Court deems appropriate.

PLAINTIFF REQUESTS FOR JURY TRIAL

Plaintiff, Keirston Simpson pursuant to Rule 38 of the Alabama Rules of Civil Procedure, prays a trial by jury on all issues.

Very respectfully submitted,



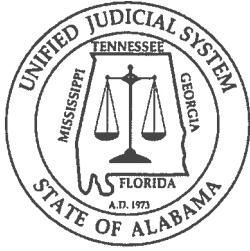
Marvin Simpson

Alabama State Bar # ASB-1442-I71S

P.O. Box 135

Dolomite, Alabama 35063

(205)908-2385



AlaFile E-Notice

68-CV-2016-900836.00

To: MARVIN EARL SIMPSON
mesimpson2917@att.net

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

KEIRSTON SIMPSON V. DENI KITEVSKI ET AL
68-CV-2016-900836.00

The following complaint was FILED on 12/19/2016 12:59:14 PM

Notice Date: 12/19/2016 12:59:14 PM

KAREN DUNN BURKS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
1851 2ND AVENUE NORTH
SUITE 130
BESSEMER, AL, 35020

205-497-8510
karen.burks@alacourt.gov



AlaFile E-Notice

68-CV-2016-900836.00

To: KITEVSKI DENI (PRO SE)
8372 ASTER DRIVE, UNIT 3B
MERRILLVILLE, IN, 46410-0000

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AlaFile E-Notice

68-CV-2016-900836.00

To: CLOBANU GHEORGHE (PRO SE)
2460 RUSSEL ROAD
KENT, WA, 98832-0000

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karen.burks@alacourt.gov



NOTICE TO CLERK

REQUIREMENTS FOR COMPLETING SERVICE BY
CERTIFIED MAIL OR FIRST CLASS MAIL

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA
KEIRSTON SIMPSON V. DENI KITEVSKI ET AL

68-CV-2016-900836.00

To: CLERK BESSEMER
clerk.bessemer@alacourt.gov

TOTAL POSTAGE PAID: \$13.36

Parties to be served by Certified Mail - Return Receipt Requested

DENI KITEVSKI

Postage: \$6.68

8372 ASTER DRIVE, UNIT 3B
MERRILLVILLE, IN 46410

GHEORGHE CLOBANU

Postage: \$6.68

2460 RUSSEL ROAD
KENT, IN 98832

Parties to be served by Certified Mail - Restricted Delivery - Return Receipt Requested

Parties to be served by First Class Mail

7014 2870 0000 2226 6320

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at www.usps.com ®.	
OFFICIAL USE	
Postage	\$ 1.68
Certified Fee	3.30
Return Receipt Fee (Endorsement Required)	2.70
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.68
Sent To: <u>Dani Kitevski</u> Street & Apt. No. or PO Box No.: <u>8372 Aster Drive Unit 3B</u> City, State, ZIP+4: <u>Merrillville, IN 46410</u>	
PS Form 3800, July 2014 See Reverse for Instructions	

7014 2870 0000 2226 6337

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For delivery information, visit our website at www.usps.com ®.	
OFFICIAL USE	
Postage	\$ 1.68
Certified Fee	3.30
Return Receipt Fee (Endorsement Required)	2.70
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.68
Sent To: <u>Gheorghe Clobanu</u> Street & Apt. No. or PO Box No.: <u>2460 Russell Road</u> City, State, ZIP+4: <u>Kent, IN 98832</u>	
PS Form 3800, July 2014 See Reverse for Instructions	

DOCUMENT 14

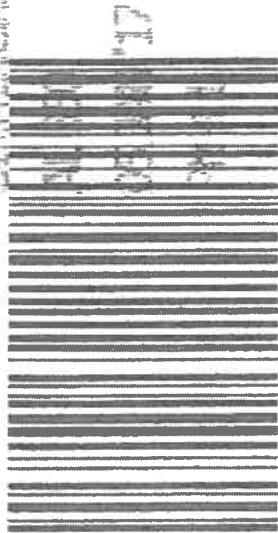
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KAREN DUNN BURKS

CIRCUIT CLERK

P.O. BOX 1310

BESSEMER, ALABAMA 35021-1310



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US POSTAGE

\$006.68



ZIP 35020

041011074155

FILED IN OFFICE

JAN 25 2017

**CIRCUIT CLERK
BESSEMER DIVISION
JEFFERSON COUNTY, ALABAMA**

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

GHEORGHE CLOBANU
2460 Russell Road
Kent, IN 98832

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

CV16-900836
S & C / D002

3. Service Type

☒ Certified Mail® ☐ Priority Mail Express™

☐ Registered ☒ Return Receipt for Merchandise

☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number

(Transfer from service label)

7014 2870 0000 2226 6337

PS Form 3811, July 2013

Domestic Return Receipt



AlaFile E-Notice

68-CV-2016-900836.00

Judge: ANNETTA H. VERIN

To: SIMPSON MARVIN EARL
mesimpson2917@att.net

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

KEIRSTON SIMPSON V. DENI KITEVSKI ET AL
68-CV-2016-900836.00

The following matter was served on 1/25/2017

D002 CLOBANU GHEORGHE

Corresponding To
CERTIFIED MAIL

KAREN DUNN BURKS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
1851 2ND AVENUE NORTH
SUITE 130
BESSEMER, AL, 35020

205-497-8510
karen.dunnburks@alacourt.gov

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

DENI KITEVSKI
8372 Aster Drive, Unit 3B
Merrillville, IN 46410

2. Article Number

(Transfer from service label)

7014 2870 0000 2226 6320

PS Form 3811, July 2013

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☒ Addressee

B. Received by (Printed Name)

DENI KITEVSKI

C. Date of Delivery

1/25/17

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

CV16-900836
S & C / D001

3. Service Type

☒ Certified Mail®☐ Priority Mail Express™☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

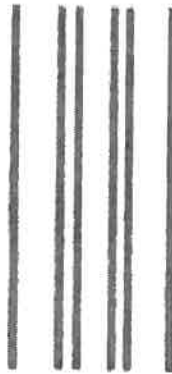
☐ Yes

Domestic Return Receipt

UNITED STATES POSTAL SERVICE

11 634

25 JAN 17



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and phone number in this box.

OFFICE OF THE CIRCUIT CLERK
BESSEMER DIVISION
JEFFERSON COUNTY, ALABAMA
P.O. BOX 1310
BESSEMER, ALABAMA 35021-1310

JEFFERSON COUNTY, ALABAMA
BESSEMER DIVISION
CIRCUIT CLERK

JAN 30 2017

MAILED IN OFFICE





AlaFile E-Notice

68-CV-2016-900836.00

Judge: ANNETTA H. VERIN

To: SIMPSON MARVIN EARL
mesimpson2917@att.net

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D001 KITEVSKI DENI

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CERTIFIED MAIL

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JEFFERSON COUNTY, ALABAMA
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